

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BRUCE CORKER d/b/a RANCHO ALOHA; *et al.*

Plaintiffs,

v.

MULVADI CORPORATION, *et al.*

Defendants.

CIVIL ACTION NO. 2:19-cv-00290-RSL

**DECLARATION OF DANIEL T. HAGEN  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR FEES**

Noted for Hearing: May 10, 2024

I, Daniel T. Hagen, declare under penalty of perjury under the laws of the United States of America as follows:

1. I am an attorney in the law firm of Karr Tuttle Campbell. All statements in this declaration are based on my personal knowledge, and I am competent to testify to them.

2. The parties have exchanged letters and information regarding Plaintiffs' damages for Kroger's established breach of the Settlement Agreement and Plaintiffs' attorney fees and costs incurred in enforcing the Settlement Agreement. Based on the information provided, including sworn declarations from Kroger, Plaintiffs accepted counsel's prior unsupported representation that the total amount of Kroger's gross profits for the breach was \$1,728.80. However, the parties have been unable to reach agreement on the amount of the fee award.

Daniel T. Hagen

**CERTIFICATE OF SERVICE**

I, Daniel T. Hagen, affirm and state that I am employed by Karr Tuttle Campbell in King County, in the State of Washington. I am over the age of 18 and not a party to the within action. My business address is: 701 Fifth Avenue, Suite 3300, Seattle, Washington 98104. On this day, I caused to be filed with the Court a true and correct copy of the foregoing document via the Court's electronic filing system, which caused service of the document to all parties registered to receive notifications through CM/ECF.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, to the best of my knowledge.

Executed on this 24th day of April 2024 at Seattle, Washington.

*s/Daniel T. Hagen*

Daniel T. Hagen  
Attorney